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Lebanon Valley College of Pennsylvania

Office of the President

(717) 867-6211

February 10, 2000

Ms. Magalie Roman Salas, Secretary
FCC Room TW-A324
445 Twelfth Street, S.W.
Washington DC 20554

RECEIVED

FEB 11 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Ms. Salas,

Lebanon Valley College strongly supports the positions expressed in the comments of the Association of Telecommunications Professionals in Higher Education (ACUTA) on the Calling Party Pays (CPP) rulemaking proceeding. We are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose the college to significant financial liability that would undermine our ongoing effort to provide educational services.

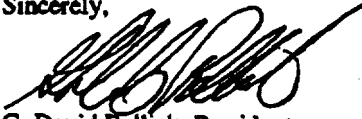
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We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by the institution. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our budget.

We understand that the record before the Commission reflects a range of views on how institutions might control the level of unauthorized CPP calls. We support the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes (SACs) to CPP numbers. The equipment used by the college and its long distance partner could be programmed at minimal cost to recognize the designated CPP SAC(s) in exactly the same way that it is programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing equipment already in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest—and accommodate the needs of educational institutions such as ours—by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,



G. David Pollick, President

Lebanon Valley College of Pennsylvania

Office of the President

(717) 867-6211

February 10, 2000

Commissioner Gloria Tristani
FCC Room 8-C302
445 Twelfth Street, S.W.
Washington DC 20554
FAX: (202) 418-7542

Dear Commissioner Tristani,

Lebanon Valley College strongly supports the positions expressed in the comments of the Association of Telecommunications Professionals in Higher Education (ACUTA) on the Calling Party Pays (CPP) rulemaking proceeding. We are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose the college to significant financial liability that would undermine our ongoing effort to provide educational services.

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Sincerely,



G. David Pollick, President

cc: Adam Krinsky, Legal Advisor to Commissioner Tristani

Lebanon Valley College of Pennsylvania

Office of the President

(717) 867-6211

February 10, 2000

Commissioner Susan Ness
FCC Room 8-B115
445 Twelfth Street, S.W.
Washington DC 20554
FAX: (202) 418-2821

Dear Commissioner Ness,

Lebanon Valley College strongly supports the positions expressed in the comments of the Association of Telecommunications Professionals in Higher Education (ACUTA) on the Calling Party Pays (CPP) rulemaking proceeding. We are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose the college to significant financial liability that would undermine our ongoing effort to provide educational services.

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Sincerely,



G. David Pollick, President

cc: Mr. Mark Schneider, Senior Legal Advisor to Commissioner Ness

Lebanon Valley College of Pennsylvania

Office of the President

(717) 867-6211

February 10, 2000

Commissioner Harold W. Furchtgott-Roth
FCC Room 8-A302
445 Twelfth Street, S.W.
Washington DC 20554
FAX: (202) 418-2802

Dear Commissioner Furchtgott-Roth,

Lebanon Valley College strongly supports the positions expressed in the comments of the Association of Telecommunications Professionals in Higher Education (ACUTA) on the Calling Party Pays (CPP) rulemaking proceeding. We are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose the college to significant financial liability that would undermine our ongoing effort to provide educational services.

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Sincerely,



G. David Pollick, President

cc: Bryan Tramont, Legal Advisor to Commissioner Furchtgott-Roth

Lebanon Valley College of Pennsylvania

Office of the President

(717) 867-6211

February 10, 2000

Mr. Thomas Sugrue
Chief, Wireless Telecommunications Bureau
FCC Room 3-C252
445 Twelfth Street, S.W.
Washington DC 20554
FAX: (202) 418-0787

Dear Mr. Sugrue,

Lebanon Valley College strongly supports the positions expressed in the comments of the Association of Telecommunications Professionals in Higher Education (ACUTA) on the Calling Party Pays (CPP) rulemaking proceeding. We are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose the college to significant financial liability that would undermine our ongoing effort to provide educational services.

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G. David Pollick, President

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(717) 867-6211

February 10, 2000

Mr. Joe Levin
Wireless Telecommunications Bureau
FCC Room 3-B135
445 Twelfth Street, S.W.
Washington DC 20554
FAX: (202) 418-7247

Dear Mr. Levin,

Lebanon Valley College strongly supports the positions expressed in the comments of the Association of Telecommunications Professionals in Higher Education (ACUTA) on the Calling Party Pays (CPP) rulemaking proceeding. We are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose the college to significant financial liability that would undermine our ongoing effort to provide educational services.

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G. David Pollick, President

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(717) 867-6211

February 10, 2000

Mr. James D. Schlichting, Deputy Bureau Chief
Wireless Telecommunications Bureau
FCC Room 3-C254
445 Twelfth Street, S.W.
Washington DC 20554
FAX: (202) 418-0787

Dear Mr. Schlichting,

Lebanon Valley College strongly supports the positions expressed in the comments of the Association of Telecommunications Professionals in Higher Education (ACUTA) on the Calling Party Pays (CPP) rulemaking proceeding. We are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose the college to significant financial liability that would undermine our ongoing effort to provide educational services.

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G. David Pollick, President

Lebanon Valley College of Pennsylvania

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(717) 867-6211

February 10, 2000

Mr. David Siehl
Wireless Telecommunications Bureau
FCC Room 3-A164
445 Twelfth Street, S.W.
Washington DC 20554
FAX: (202) 418-7247

Dear Mr. Siehl,

Lebanon Valley College strongly supports the positions expressed in the comments of the Association of Telecommunications Professionals in Higher Education (ACUTA) on the Calling Party Pays (CPP) rulemaking proceeding. We are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose the college to significant financial liability that would undermine our ongoing effort to provide educational services.

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Ms. Kris Monteith
Wireless Telecommunications Bureau
FCC Room 3-C122
445 Twelfth Street, S.W.
Washington DC 20554
FAX: (202) 418-7247

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